

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

\_\_\_\_\_  
MICHAEL E. VACEK, JR., derivatively on  
behalf of WALTER INVESTMENT  
MANAGEMENT CORP.,

Plaintiff,

v.

GEORGE M. AWAD, DANIEL G.  
BELTZMAN, MICHAEL M. BHASKARAN,  
NEAL P. GOLDMAN, WILLIAM J.  
MEURER, ALVARO G. de MOLINA,  
VADIM PERELMAN, and ANTHONY N.  
RENZI,

Defendants,

and

WALTER INVESTMENT MANAGEMENT  
CORP.,

Nominal Defendant.

Case 2:17-cv-02820-JCJ

**JOINT STATUS REPORT**

WHEREAS, on July 2, 2018, the parties informed the court that they were engaged in discussions seeking to resolve this action; and

WHEREAS, on July 5, 2018, the court ordered the parties to submit a status report to the Court on the progress of their settlement discussions on or before July 23, 2018.

THEREFORE, the parties jointly provide the Court with the following status report:

1. The parties have reached an agreement in principle to settle the action subject to the drafting of a formal settlement agreement, notice to stockholders, and approval of the Court following a settlement hearing pursuant to Rule 23.1 of the Federal Rules of Civil Procedure.

2. The parties are currently negotiating the terms of the formal settlement agreement and related documents, and anticipate providing the agreement and related documents to the

Court for the Court's consideration and the scheduling of a settlement hearing pursuant to Federal Rule of Civil Procedure 23.1.

Dated: July 23, 2018  
Philadelphia, PA

**DONOVAN LITIGATION GROUP, LLC**

s/ Michael D. Donovan

Michael D. Donovan, Esquire (PA ID: 51895)  
15 St. Asaphs Road  
Bala Cynwyd, PA 19004-2405  
T: (610) 647-6067  
F: (610) 647-7215  
mdonovan@donovanlitigationgroup.com

-and-

**GAINEY McKENNA & EGGLESTON**

Thomas J. McKenna  
Gregory M. Egleston  
440 Park Avenue South, 5th Floor  
New York, New York 10016  
Tel: (212) 983-1300  
Fax: (212) 983-0383  
tjmckenna@gme-law.com  
egleston@gme-law.com

Attorneys for Plaintiff

**HANGLEY ARONCHICK SEGAL  
PUDLIN & SCHILLER**

/s/ William T. Hangley

William T. Hangley (PA ID: 03533)  
Jonathan L. Cochran (PA ID: 314382)  
One Logan Square, 27th Floor  
Philadelphia, PA 19103  
Tel: (215) 568-6200  
Fax: (215) 568-0300  
whangley@hangley.com

-and-

**WEIL, GOTSHAL & MANGES LLP**

Joseph S. Allerhand  
Stephen A. Radin  
Matthew S. Connors  
Andrew Blumberg  
767 Fifth Avenue  
New York, NY 10153  
Tel: (212) 310-8000  
Fax: (212) 310-8007  
joseph.allerhand@weil.com  
stephen.radin@weil.com

Attorneys for Nominal Defendant  
Walter Investment Management Corp.,  
now known as Ditech Holding Corporation

**DECHERT, LLP**

/s/ Ellen L. Ratigan

Stuart T. Steinberg (PA ID: 82196)  
Ellen L. Ratigan (PA ID: 319149)  
Cira Center  
2929 Arch Street  
Philadelphia, PA 19104

Tel: (215) 994-4000  
Fax: (215) 994-2222  
ellen.ratigan@dechert.com

-and-

David H. Kistenbroker  
Joni S. Jacobsen  
35 West Wacker Drive  
Suite 3400  
Chicago, IL 60601  
Tel: (312) 646-5811  
Fax: (312) 646-5858  
david.kistenbroker@dechert.com

Attorneys for Defendants George M.  
Awad, Daniel G. Beltzman, Michael M.  
Bhaskaran, Neal P. Goldman, William J.  
Meurer, Alvaro G. de Molina, Vadim  
Perelman, and Anthony N. Renzi

**CERTIFICATE OF SERVICE**

I, Jonathan L. Cochran, hereby certify that on the 23<sup>rd</sup> day of July, 2018, I caused a true and correct copy of the foregoing Joint Status Report to be filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to CM/ECF participants.

/s/ Jonathan L. Cochran  
Jonathan L. Cochran